# UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION, a Delaware corporation,	) Case No. 16-cv-1054 (WMW/DTS)
Plaintiff,	)
v.	)
FEDERAL INSURANCE COMPANY, an Indiana corporation, and ACE AMERICAN	) ) )
INSURANCE COMPANY, a Pennsylvania corporation.	) )
Defendants.	)

### JOINT MOTION REGARDING CONTINUED SEALING

Documents have been filed under temporary seal in connection with Defendants' Motion for Leave to File Amended Answer, Dkt. Nos. 458, 460, 460-1 through 460-14, 464, 465, 468, and 471. Pursuant to Local Rule 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN	APPLICABLE C	OLUMN	NONPARTY	REASON WHY
NO.	REDACTED	OF	Parties Agree	Parties Agree	Parties	THAT	DOCUMENT SHOULD
	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed		DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
458		Memorandum		X		N/A	
		of Law in					The Parties agree there is no
		Support of					confidential information in
		Defendants'					this document. The document
		Motion for					should be unsealed.
		Leave to File					
		Amended					
		Answer – Only					
		First Page Filed					
		in Error, Refiled					
		at Dkt. 464					
460		Exhibit A to		X		N/A	
		Declaration of					The Parties agree there is no
		Terrence					confidential information in
		Fleming in					this document. The document
		Support of					should be unsealed.
		Defendants'					
		Motion for					
		Leave to File					
		Amended					
		Answer – Only					
		First Page Filed					
		in Error, Refiled					
		at Dkt. 465					
460-1		Exhibit 1 to	X			N/A	Defendants contend this
		Declaration of					document should remain
		Terrence					sealed. Defendants will file a

	DOCUMENT SHOULD REMAIN SEALED OR BE
VERSION         DOCUMENT         Doc. Should         Doc. Should         Disagree         DESIGNATED         1	REMAIN SEALED OR BE
(IF FILED) Remain Sealed Be Unsealed DOC.	UNSEALED
CONFIDENTIAL	
(IF ANY)	
	redacted version of this
	document forthwith. This
	contract was filed under seal
	to protect the Parties'
	commercially confidential
	information. This
	commercially confidential
	information includes the
	terms of the Software License
	Agreement that is the subject
	of this dispute. The license
	agreement was designated as
	Confidential by Plaintiff
ur ur	under the Protective Order.
460-2 Exhibit 2 to X N/A TI	This document should remain
	sealed. This document was
	filed under seal to protect the
	Parties' commercially
	confidential information.
Defendants'	confidential information.
Motion for	
Leave to File	
Amended	
Answer	
	This document should remain
	sealed. This document was

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN	APPLICABLE C	OLUMN	NONPARTY	REASON WHY
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	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed	S	DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
		Terrence					filed under seal to protect the
		Fleming in					Parties' commercially
		Support of					confidential information.
		Defendants'					
		Motion for					
		Leave to File					
		Amended					
		Answer					
460-4		Exhibit 4 to	X			N/A	This document should remain
		Declaration of					sealed. This document was
		Terrence					filed under seal to protect the
		Fleming in					Parties' commercially
		Support of					confidential information.
		Defendants'					
		Motion for					
		Leave to File					
		Amended					
		Answer					
460-5		Exhibit 5 to		X		N/A	The Parties agree there is no
		Declaration of					confidential information in
		Terrence					this exhibit. It should be
		Fleming in					unsealed.
		Support of					
		Defendants'					
		Motion for					
		Leave to File					
		Amended					

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN	APPLICABLE C	OLUMN	NONPARTY	REASON WHY
NO.	REDACTED VERSION (IF FILED)	OF DOCUMENT	Parties Agree Doc. Should Remain Sealed	Parties Agree Doc. Should Be Unsealed	Parties Disagree	THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
		Answer				,	
460-6		Exhibit 6 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This document was filed under seal to protect the Parties' commercially confidential information. This commercially confidential information includes the terms of the Software License Agreement that is the subject of this dispute. The license agreement was designated as Confidential by Plaintiff under the Protective Order.
460-7		Exhibit 7 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This document was filed under seal to protect the Parties' commercially confidential information.
460-8		Exhibit 8 to Declaration of Terrence	X			N/A	This document should remain sealed. This deposition transcript was filed under seal

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN	APPLICABLE C	OLUMN	NONPARTY	REASON WHY
NO.	REDACTED	OF	Parties Agree	Parties Agree	Parties	THAT	DOCUMENT SHOULD
	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed		DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
		Fleming in					to protect the Parties'
		Support of					commercially confidential
		Defendants'					information.
		Motion for					
		Leave to File					
		Amended					
		Answer					
460-9		Exhibit 9 to	X			N/A	This document should remain
		Declaration of					sealed. This deposition
		Terrence					transcript was filed under seal
		Fleming in					to protect the Parties'
		Support of					commercially confidential
		Defendants'					information.
		Motion for					
		Leave to File					
		Amended					
		Answer					
460-10		Exhibit 10 to	X			N/A	This document should remain
		Declaration of					sealed. This expert damages
		Terrence					report was filed under seal to
		Fleming in					protect the Parties'
		Support of					commercially confidential
		Defendants'					information.
		Motion for					
		Leave to File					
		Amended					
		Answer					

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NO.	REDACTED	OF	Parties Agree	Parties Agree	Parties	THAT	DOCUMENT SHOULD
	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed		DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
460-11		Exhibit 11 to	X			N/A	This document should remain
		Declaration of					sealed. This deposition
		Terrence					transcript was filed under seal
		Fleming in					to protect the Parties'
		Support of					commercially confidential
		Defendants'					information.
		Motion for					
		Leave to File					
		Amended					
		Answer					
460-12		Exhibit 12 to	X			N/A	This document should remain
		Declaration of					sealed. This expert report was
		Terrence					filed under seal to protect the
		Fleming in					Parties' commercially
		Support of					confidential information.
		Defendants'					
		Motion for					
		Leave to File					
		Amended					
		Answer					
460-13		Exhibit 13 to	X			N/A	This document should remain
		Declaration of					sealed. This expert damages
		Terrence					report was filed under seal to
		Fleming in					protect the Parties'
		Support of					commercially confidential
		Defendants'					information.
		Motion for					

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN	APPLICABLE C	OLUMN	NONPARTY	REASON WHY
NO.	REDACTED	OF DOCUMENT	Parties Agree	Parties Agree	Parties	THAT DESIGNATED	DOCUMENT SHOULD
	VERSION (IF FILED)	DOCUMENT	Doc. Should Remain Sealed	Doc. Should Be Unsealed	Disagree	DOC.	REMAIN SEALED OR BE UNSEALED
						(IF ANY)	
		Leave to File Amended Answer				(22.12.12)	
460-14		Exhibit 14 to Declaration of Terrence Fleming in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. This deposition transcript was filed under seal to protect the Parties' commercially confidential information.
464		Memorandum of Law in Support of Defendants' Motion for Leave to File Amended Answer	X			N/A	This document should remain sealed. Defendants will file a redacted version of this motion forthwith. This motion was filed under seal to protect the Parties' commercially confidential information. This motion also contains excerpts and quotations from documents and depositions that the parties have designated Confidential, Attorneys' Eyes Only under the Protective

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	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed		DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
							Order because they contain
							the Parties' confidential
							business information.
465		Exhibit A to	X			N/A	This document should remain
		Declaration of					sealed. Defendants will file a
		Terrence					redacted version of this
		Fleming in					document forthwith. The
		Support of					unredacted version of this
		Defendants'					document was filed under seal
		Motion for					to protect the Parties'
		Leave to File					commercially confidential
		Amended					information.
468		Answer Fair Isaac	X			N/A	This document should remain
408			Λ			IN/A	sealed. Plaintiff will file a
		Corporation's Opposition to					redacted version of this
		Defendants'					document forthwith. This
		Motion for					motion was filed under seal to
		Leave to File					protect the Parties'
		Amended					commercially confidential
		Answer					information.
471		Exhibit 1 to	X			N/A	This document should remain
''		Declaration of					sealed. This deposition
		Allen W.					transcript was filed under seal
		Hinderaker in					to protect the Parties'

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN	APPLICABLE C	OLUMN	NONPARTY	REASON WHY
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	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed	S	DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
		Support of Fair					commercially confidential
		Isaac					information.
		Corporation's					
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					
471-1		Exhibit 2 to	X			N/A	This document should remain
		Declaration of					sealed. This deposition
		Allen W.					transcript was filed under seal
		Hinderaker in					to protect Defendants'
		Support of Fair					commercially confidential
		Isaac					information.
		Corporation's					
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
171.0		Answer	**			27/4	
471-2		Exhibit 3 to	X			N/A	This expert report should
		Declaration of					remain sealed. This report
		Allen W.					was filed under seal to protect
		Hinderaker in					the Parties' commercially
		Support of Fair					confidential information.

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	(IF FILED)		Remain Sealed	Be Unsealed		DOC.	UNSEALED
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						(IF ANY)	
		Isaac					
		Corporation's					
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					
471-3		Exhibit 5 to	X			N/A	This document should remain
		Declaration of					sealed. This email transcript
		Allen W.					was filed under seal to protect
		Hinderaker in					the Parties' commercially
		Support of Fair					confidential information.
		Isaac					
		Corporation's					
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					
471-4		Exhibit 6 to	X			N/A	This document should remain
		Declaration of					sealed. This email transcript
		Allen W.					was filed under seal to protect
		Hinderaker in					the Parties' commercially
		Support of Fair					confidential information.
		Isaac					

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NO.	REDACTED	OF	Parties Agree	Parties Agree	Parties	ТНАТ	DOCUMENT SHOULD
	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed	S	DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
		Corporation's					
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					
471-5		Exhibit 7 to	X			N/A	This document should remain
		Declaration of					sealed. This email transcript
		Allen W.					was filed under seal to protect
		Hinderaker in					the Parties' commercially
		Support of Fair					confidential information.
		Isaac					
		Corporation's					
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					
471-6		Exhibit 10 to	X			N/A	This document should remain
		Declaration of					sealed. This interrogatory
		Allen W.					answer was filed under seal to
		Hinderaker in					protect the Defendants'
		Support of Fair					commercially confidential
		Isaac					information.
		Corporation's					

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN APPLICABLE COLUMN			NONPARTY	REASON WHY
NO.	REDACTED	OF	Parties Agree	Parties Agree	Parties	THAT	DOCUMENT SHOULD
	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed		DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					
471-7		Exhibit 11 to	X			N/A	This document should remain
		Declaration of					sealed. This emailt was filed
		Allen W.					under seal to protect the
		Hinderaker in					Parties' commercially
		Support of Fair					confidential information.
		Isaac					
		Corporation's					
		Opposition to					
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					
471-8		Exhibit 12 to	X			N/A	This document should remain
		Declaration of					sealed. This email was filed
		Allen W.					under seal to protect the
		Hinderaker in					Parties' commercially
		Support of Fair					confidential information.
		Isaac					
		Corporation's					
		Opposition to					

## CASE 0:16-cv-01054-DTS Doc. 529 Filed 09/05/19 Page 14 of 15

DKT.	DKT. NO. OF	DESCRIPTION	MARK "X" IN APPLICABLE COLUMN			NONPARTY	REASON WHY
NO.	REDACTED	OF	Parties Agree	Parties Agree	Parties	THAT	DOCUMENT SHOULD
	VERSION	DOCUMENT	Doc. Should	Doc. Should	Disagree	DESIGNATED	REMAIN SEALED OR BE
	(IF FILED)		Remain Sealed	Be Unsealed		DOC.	UNSEALED
						CONFIDENTIAL	
						(IF ANY)	
		Defendant's					
		Motion for					
		Leave to File					
		Amended					
		Answer					

Dated: September 5, 2019

#### /s/ Joseph Dubis

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